

# EXHIBIT 1

## Jointly Proposed Schedule for SSC Cases

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY )  
LITIGATION )  
\_\_\_\_\_ )

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO: )

Suits Naming Specialty Surgery Center, )  
Crossville, PLLC )  
\_\_\_\_\_ )

**PROPOSED SCHEDULING ORDER APPLICABLE TO THE SSC CASES**

October \_\_\_\_, 2016

Boal, M.J.

The Court hereby enters the following schedule to apply to the suits naming Specialty Surgery Center, PLLC ("SSC").

<b><u>Common Discovery Schedule</u></b>	
CMC to Complete Review of Documents Subject to PSC's Subpoena	10/13/16
SSC to Complete Review of Documents Subject to PSC's Subpoena	11/11/16
Completion of Common Fact Discovery	12/9/16
Plaintiffs' Common Expert Disclosures	1/6/17
Defendants' Common Expert Disclosures	2/3/17
Completion of Common Expert Depositions	3/31/17

<b><u>Case-Specific Discovery Schedule</u></b>	
Completion of Plaintiffs' Depositions	1/20/17
Plaintiffs' Case-Specific Expert Disclosures	2/17/17
Defendants' Case-Specific Expert Disclosures	3/17/17
Completion of Case-Specific Expert Depositions	4/28/17

All other pretrial deadlines will be set by subsequent order of the trial court.

**So Ordered.**

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JENNIFER C. BOAL  
United States Magistrate Judge